

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NORTHERN CALIFORNIA**  
**SAN FRANCISCO DIVISION**

NASSER HAMEDANI, an individual  
doing business as GLOBAL VISION  
UNLIMITED,

Plaintiff,

vs.

BAYER CORPORATION, an Indiana  
corporation, BAYER HEALTHCARE  
LLC, a Delaware Limited Liability  
Company,

Defendants.

Case No.: C05-02781 MJJ

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND EXPERT DEADLINES**

Courtroom: 11

Judge: Honorable Martin J. Jenkins

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for Plaintiff Nasser Hamedani (“Hamedani”) and Defendants Bayer Corporation and Bayer Healthcare LLC (collectively, “Bayer”), that there is good cause to extend the expert deadlines as set forth herein.

Pursuant to Civil L.R. 6-2(a), the undersigned counsel of record declare that:

(1) The parties will partake in mediation on November 2, 2006.

(2) Certain expert deadlines are before and immediately following the scheduled mediation. In order to avoid incurring additional costs and expending time on expert discovery prior to the mediation, the parties wish to extend expert designation and report deadlines by sixty (60) days.

(3) On October 11, 2006, the Court extended certain deadlines in this case, including the close of expert discovery. The current close of expert discovery is February 20, 2007. The parties do not request an extension of this deadline.

**STIPULATION AND ~~PROPOSED~~ ORDER TO EXTEND EXPERT DEADLINES**

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Pursuant to Civil L.R. 6-2, the parties stipulate to and request an order changing the following deadlines:

- (a) Designation of Experts will be due by **December 29, 2006**.
- (b) Expert Reports will be due by **January 5, 2007**
- (c) Designation of Supplemental/Rebuttal Experts will be due by **February 2, 2007**.
- (d) Supplemental/Rebuttal Expert Reports will be due by **February 2, 2007**.

Respectfully submitted,

Dated: October 19, 2006

/s/ Patrick E. Guevara  
Attorneys for Plaintiff

MCNICHOLS RANDICK O'DEA & TOOLIATOS LLP  
Everitt G. Beers  
Kevin R. Martin  
Patrick E. Guevara

Dated: October 19, 2006

/s/ Sharon A. Ceresnie  
Attorneys for Defendants

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GLYNN & FINLEY LLP  
Clement L. Glynn

**THE FOREGOING STIPULATION IS  
APPROVED AND IS SO ORDERED.**

Dated: 11/1/2006

  
UNITED STATES DISTRICT JUDGE

STIPULATION AND [REDACTED] ORDER TO EXTEND EXPERT DEADLINES

C05-02781 MJJ